

FILED

Dec 15 2020

SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE

SEALED BY ORDER OF THE COURT

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 3 Acting Under Authority Conferred By 28 U.S.C. § 515

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12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN JOSE DIVISION

15 UNITED STATES OF AMERICA,) CASE NO. 18-CR-00258 EJD
16 Plaintiff,)
17 v.) DECLARATION OF VANESSA BAEHR-JONES
18 ELIZABETH HOLMES and RAMESH) IN SUPPORT OF UNITED STATES' OMNIBUS
19 "SUNNY" BALWANI,) REPLY
20 Defendants.)

[FILED PROVISIONALLY UNDER SEAL
PURSUANT TO COURT ORDER OF JANUARY
13, 2020]

21 I, Vanessa Baehr-Jones, declare:

22 1. I am an Assistant United States Attorney (AUSA) representing the United States of
 23 America, the plaintiff in this case.

24 2. Attached hereto as Exhibit 1 is a true and correct copy of a Federal Bureau of
 25 Investigation (FBI) 302 report of interview for Paige Williams.

26 3. Attached hereto as Exhibit 2 is a true and correct copy of an FBI 302 report of interview
 27 for Nicole Canas.

4. Attached hereto as Exhibit 3 is a true and correct copy of a video clip, dated July 15, 2015, depicting Defendants Elizabeth Holmes and Ramesh Balwani at a Theranos event.

5. Attached hereto as Exhibit 4 is a true and correct copy of a video clip, dated July 15, 2015, depicting Holmes and Balwani at a Theranos event.

6. Attached hereto as Exhibit 5 is a true and correct copy of a video clip, dated April 7, 2015, depicting Holmes and Balwani at a Theranos event.

7. Attached hereto as Exhibit 6 is a true and correct copy of a video clip, dated April 7, 2015, depicting Holmes and Balwani at a Theranos event.

8. Attached hereto as Exhibit 7 is a true and correct copy of a video clip, dated April 7, 2015, depicting Holmes and Balwani at a Theranos event.

9. Attached hereto as Exhibit 8 is a true and correct copy of a video clip, dated April 7, 2015, depicting Holmes and Balwani at a Theranos event.

10. Attached hereto as Exhibit 9 is a true and correct copy of a video clip, dated April 7, 2015, depicting Holmes and Balwani at a Theranos event.

11. Attached hereto as Exhibit 10 is a true and correct copy of a video clip, dated April 7, 2015, depicting Holmes and Balwani at a Theranos event.

12. Attached hereto as Exhibit 11 is a true and correct copy of a video clip, dated April 7, 2015, depicting Holmes and Balwani at a Theranos event.

13. Attached hereto as Exhibit 12 is a true and correct copy of a video clip, dated April 7, 2015, depicting Holmes and Balwani at a Theranos event.

14. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Oakland, California, on December 11, 2020.

DATED: December 11, 2020


VANESSA BAEHR-JONES
Assistant United States Attorney